

EXHIBIT A:

PROPOSED ANSWER

TO THE COMPLAINT

DEFENDANT'S ANSWER TO COMPLAINT

Defendant, Nordic Trust Alliance KB, LLC ("Defendant"), hereby responds to Plaintiff's Complaint as follows:

1. Paragraphs 1-10: Defendant denies the allegations in these paragraphs, including any involvement in the purported fraudulent schemes described therein.
2. Paragraph 11: Defendant denies any knowledge of or participation in the alleged "SBLC Syndicate" or any activities described as fraudulent.
3. Paragraph 12: Defendant denies the specific allegations of misrepresentations or misconduct and denies any wrongdoing.
4. Paragraphs 13-20: Defendant lacks sufficient knowledge or information to admit or deny the allegations and therefore denies them.
5. Paragraphs 21-191: Defendant denies each and every allegation contained in these paragraphs. Defendant denies participating in any fraudulent activities, denies making any misrepresentations, and denies any involvement in the purported scheme alleged by Plaintiff. Defendant asserts that the allegations are speculative, conclusory, and lack sufficient factual support to establish liability against Defendant.

AFFIRMATIVE DEFENSES

1. Failure to State a Claim: Plaintiff's Complaint fails to state a claim upon which relief can be granted.
2. Statute of Limitations: Plaintiff's claims are barred, in whole or in part, by the applicable statute of limitations.
3. Lack of Personal Jurisdiction: This Court lacks personal jurisdiction over Defendant as he resides and conducts business outside the jurisdiction.

4. No Proximate Cause: Plaintiff's alleged damages were not proximately caused by Defendant's actions.
5. Other Defenses: Defendant reserves the right to assert additional defenses as discovery progresses.

WHEREFORE, Defendant respectfully requests that Plaintiff's claims be dismissed with prejudice, that judgment be entered in favor of Defendant, and for such other relief as the Court deems just and proper.

EXHIBIT B:
AFFIDAVIT

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

BASIL HANTASH

Plaintiff,

Civil Action No.: 3:24-CV-2392-D

v.

JAMES WILLIAM BYRD, JOSHUA
MATTHEW WEARMOUGH, WALDON
FENSTER, DANIEL FERNANDES ROJO
FILHO, HERIBERTO CANDELARIO
PEREZ VALDES, DEAL EXCHANGE,
LLC, SOTERIA GROUP, LLC, and
NORDIC TRUST ALLIANCE KB, LLC,

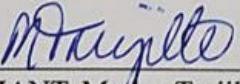
Defendants,

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AFFIDAVIT OF MARLEN TRUJILLO

KNOW ALL MEN BY THESE PRESENTS:

1. That I am the legal assistant for attorney Jorge Diaz Cueto
2. That I received answer and affirmative defenses from the attorney who is currently out of the Country for medical reasons.
3. That I misunderstood his instructions and therefore did not timely file the Answer and Affirmative Defenses.
4. I believed that I had receive draft not the final version to be filed.



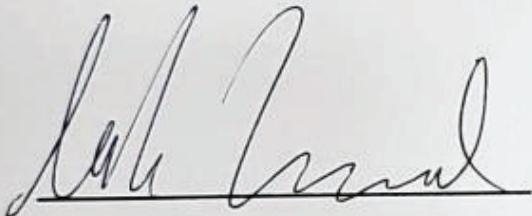
AFFIANT, Marlen Trujillo

State of Florida, Broward County

Signed and sworn before me on 17th day of JANUARY 2025, by

MARlen Trujillo

Name of person making statement



Signature of Notary Public

My commission expires: 11/29/2026